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Solutia Inc.

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March 10, 2003

Mr. Nabil S. Fayoumi
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

**Re: Sauget Area 2 Site – October 3, 2002 Unilateral Administrative Order (UAO)
Groundwater Operable Unit
4 - March 2003 Monthly Report**

Dear Mr. Fayoumi,

Attached is the March 2003 Monthly Report for the Sauget Area 2 Site October 3, 2002 Unilateral Administrative Order (UAO) - Groundwater Operable Unit. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section XII, paragraph 62, Progress Reports.

Sincerely,
Solutia Inc.

A handwritten signature in black ink, appearing to read "Steve Smith".

Steven D. Smith
Project Coordinator

cc: Bardo, Ken - U. S. EPA
Sandra Bron - IEPA
Mayor D. Reed - Cahokia
Village of Sauget – c/o P. H. Weis & Associates (Attn: Brian Nelson)
Mayor P. Sauget - Sauget, IL
Kevin de la Bruere - U. S. Fish & Wildlife Service
Mike Henry - IDNR
Linda Tape – Husch & Eppenberger
Richard Williams – Solutia

Sauget Area 2 Site - Sauget, Illinois

October 3, 2002 UAO – Groundwater Operable Unit

Monthly Report

Date of Report: March 10, 2003
Period Covered: February 1, 2003 - February 28, 2003
Next Report Period: March 1, 2003 - March 28, 2003

Background

A Unilateral Administrative Order (UAO) was issued to a number of Potentially Responsible Parties, including Solutia, by the U. S. EPA on October 3, 2002, requiring installation of a 3,500 foot long, "U"-shaped, fully penetrating barrier wall to be installed between the downgradient boundary of Sauget Area 2 Site R and the Mississippi River. The wall will be placed to abate the release of impacted groundwater to the river. The UAO (U.S. EPA Docket No. V-W-'02-C-716) also requires installation of three partially penetrating groundwater recovery wells to be installed inside the "U"-shaped barrier wall. The recovery wells will be used to control groundwater moving to the wall. Extracted groundwater will be treated and ultimately discharged to the Mississippi River in compliance with all applicable or relevant and appropriate requirements. Groundwater quality, groundwater level, sediment and surface water monitoring will be used to ensure acceptable performance of the interim groundwater remedy. The work required by the UAO is an interim remedy for the Groundwater Operable Unit at the Sauget Area 2 Site. The remedy was specified in a Record of decision issued on September 30, 2002.

The UAO became effective on November 15, 2002. By letter dated November 15, 2002, Solutia informed the U. S. EPA of its intention to comply with the terms of the UAO.

Agency Actions / Communications

- The RD/RA Work Plan submitted on December 19, 2002 was conditionally approved in an e-mail message dated February 4, 2003. The conditional approval contained a number of questions and comments. Responses to these will be provided at the same time that responses to comments on the Pre-Final design are submitted.
- Comments were provided by U. S. EPA in an e-mail dated February 20, 2003 on the Pre-Final (95%) Remedial Design submitted on January 31, 2003. Responses to those comments are due on March 6, 2003.

- Met with U. S. EPA and IEPA on February 25, 2003 to provide a status report on the project.

Work Performed during the reporting period

- **Access**
Access agreements are being negotiated with all of the property owners whose property will be affected by construction of the groundwater control system. The majority of these property owners were recipients of the UAO. As such, access agreements with these parties are not subject to the reporting requirements of Article XVII, Clause 76, of the UAO. The only property owner not named in the Order is the Metropolitan East Sanitary District (MESD). Negotiations are proceeding with MESD for an ordinance allowing access and Solutia's attorneys, Husch and Eppenger, are providing regular status reports to the EPA attorney, Mr. Tom Martin.
- **Contractor Procurement**
Prequalification documents were sent to 11 contractors who potentially have the skills required to construct the barrier wall. Responses were received from six contractors and these were evaluated using relevant project experience, experience of proposed project staff, safety statistics, and financial strength as criteria. A short list of four contractors was selected and these were invited to submit proposals to construct the project. The selected contractors are scheduled to present their proposals during the week of March 10, 2003. It is expected that negotiations with the selected contractor will be completed by the first week of April and that a contract will be signed with the successful bidder by April 15, 2003.
- **Groundwater Discharge Permits**
In order to obtain a representative sample of the extracted groundwater, one of the extraction wells was installed at the site. This well will be developed and the extracted groundwater will be treated on site and discharged to the P-Chem treatment facility through a temporary pipeline. Permit applications for discharge of the groundwater from this pilot test have been submitted to both IEPA and to the American Bottoms Regional Wastewater Treatment Facility (ABRWTF). A permit application has also been submitted to IEPA to allow discharge of the groundwater extracted from the full scale system to ABRWTF. It is anticipated that the pilot test will be performed in April, assuming that the permit applications are approved on a timely basis.

The local limits evaluation carried out by ABRWTF identified potential concerns with 4-chloroaniline and, to a lesser extent, with 2-chloroaniline. Based on these concerns, a work plan was submitted to IEPA to perform a toxicity study with the aim of revising the acute and chronic discharge limits for ABRWTF. That work plan was approved in January 2003 and the study commenced at that time. The

study is progressing well and it is anticipated that the results will be available in May 2003.

Data Submittal

No data are submitted with this report.

Work scheduled for next reporting period

- Continue working with IEPA, and ABRWTF to expedite issuance of the temporary and permanent discharge permits.
- In order to expedite the construction of the groundwater control system, it is proposed that the extraction wells and permanent discharge system will be constructed prior to the barrier construction. Accordingly, a contractor will be selected to install and develop the remaining two extraction wells. Bid packages will also be developed for the installation of the disposal pipeline, the instrumentation and control system, and the associated electrical supply system.
- A barrier wall construction contractor will be selected for contract negotiations and those negotiations will commence in March.

Problems and Solutions

None

Submittal Schedule Status

See attached UAO schedule

Issues under review

None

Comments

None

Sauget Area 2 Site - Sauget, Illinois

October 3, 2002 UAO – Groundwater Operable Unit

SCHEDULE

Deliverable	Description	Due Date
Effective Date		15-Nov-02
Notice of Intent to Comply	On or before effective date	15-Nov-02
Designation of Project Coordinator and Contractors	15 days after effective date	30-Nov-02
Access	60 days after effective date	14-Jan-03
Notice of land ownership to appropriate governmental office	5 days after effective date	20-Nov-02
Notice of land ownership recording and indexing to U.S. EPA	15 days after effective date	30-Nov-02
RD/RA Workplan	45 days after effective date	30-Dec-02
Assurance of ability to complete work	30 days after effective date	15-Dec-02
Monthly Reports	To be submitted on or before the 10 th date of each month following the effective date of the UAO	10-Dec-02
Construction Completion Report	Within 30 days of a successful final inspection	TBD

BCC: (via e-mail only)

B. Gilhousen - 3S

B. Yare - 1S

R. Prokop - 1740

S. Wendler - 3S

D. Ridenhower – 1740